

In The United States District Court  
for the District of Massachusetts

Leo J. Sheehan, III  
plaintiff

v.

The United States Federal Government,  
The Department of Defence,  
The Central Intelligence Agency  
defendant

CA 73-2005-M

Complaint

The plaintiff brings this <sup>civil</sup>~~criminal~~ action against the above named defendants to enjoin that agency and department from further persuit of certain actions alledged here in section entitled "Plaintiff's Claim" and to recover monetary settlements in return for the damages done in the harrassments and persecutions of those previous actions.

Jurisdiction and Venue

1. At all times relevant to this complaint, plaintiff, Leo J. Sheehan, III was a citizen of the United States of America. Plaintiff's permanent residence was at 173 High Street, Reading, Massachusetts until 1 December 1972 and thereafter at 20 Royal Crest Drive, North Andover, Massachusetts. While maintaining residence in Reading, Mass. plaintiff was outside the United States from April 1967 until November 1967, on assignment as consultant engineer for Raytheon Co. at Aviano Air Force Base, Aviano Udine, Italy. Plaintiff was born in New Albany, Indiana, U.S.A. on 15 October 1943 and is a U. S. citizen by birth. The Plaintiff is now employed as an electrical engineer at Western Electric Company, Inc. in North Andover, Massachusetts.
2. Defendants; the United States Federal Government Departement of Defence, the Central Intelligence Agency, are publically known and require no definition.
3. This Cause of action is filed in this court wherein the matter of controversey exceeds the sum of \$1,000,000 one million dollars, exclusive of costs and reasonable attorneys fees.

Plaintiff's Claim

5. Plaintiff was drugged in his high school years to the servere detriment of his grades.
6. Plaintiff was drugged in his college years at home and in his classes at Lowell Technological Institute to the resulting detriment of his grades and professional advancement.
7. Plaintiff was drugged while employed at Lowell Technological Institute, Lowell, Massachusetts, and Massachusetts Institute of Technology Instrumentation Laboratory, Cambridge, Mass. Plaintiff was drugged while employed at Epsco, inc. Westwood, Massachusetts, Sylvania Electric Products East, Waltham, Mass. Raytheon Company, Burlington, Massachusetts and Aviano Italy, Sanders Associates Inc. Bedford, Massachusetts, and at Western Electric Company, Inc. North Andover, Massachusetts.
8. Plaintiff has been drugged outside of his places of employment at locations too numerous to specify.
9. Plaintiff was forcibly submitted to a prefrontal lobotomy and a partial testicalectomy in November 1969.
10. Plaintiff has been forcibly submitted to other medical operations against his will or desire.

11. Plaintiff's home telephone and all of the rooms in his domicile have been bugged and monitored to the detriment of his privacy.
12. Plaintiff's salary, professional advancement, and pursuit of all forms of personal happiness is now and has been limited and controled by the defendants.

Wherefore, the plaintiff prays that the court:

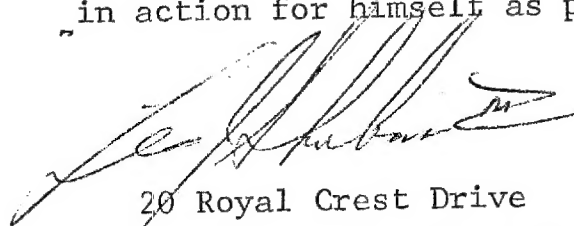
1. Cause to be issued a temporary restraining order enjoining the defendants from further actions of the nature above stipulated of of any nature of harm harassment, or threat to life.
2. Cause the issuance of a preliminary injunction, enjoining the defendants from further actions.
3. Cause to be issued a final order enjoining the defendants from these actions.
4. Award to the plaintiff its costs and reasonable attorneys fees.
5. Award to the plaintiff damages in the sum of \$1,000,000 one million dollars, or such ammounts as the court shall deem reasonable as payment for the damages of such actions taken by the deffendants.

6. Such other and further releif as the court may deem appropriate.

Leo. J. Sheehan, III

25 June 1973

in action for himself as plaintiff



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